

12405

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHRISTIAN DAIGRE,	)	
	)	
Plaintiff,	)	
	)	Case No.: 14 CV 1980
v.	)	
	)	Judge Elaine Bucklo
MEL DAVIS, Chief of Police of the	)	
Village of Robbins, in his individual	)	Magistrate Judge Finnegan
and official capacities, TYRONE WARD,	)	
Mayor of the Village of Robbins, in his	)	
individual and official capacities, JAMES E.	)	JURY TRIAL DEMANDED
COFFEY, SR., Village of Robbins Trustee,	)	
in his individual and official capacities,	)	
DAVID BRYANT, Village of Robbins	)	
Trustee, in his individual and official	)	
capacities, ILA DAVIS, Village of Robbins	)	
Trustee, in her individual and official	)	
capacities, LENNY JOHNSON, Village of	)	
Robbins Trustee, in his individual and	)	
official capacities, SHANTIEL SIMON,	)	
Village of Robbins Trustee, in his	)	
individual and official capacities, and	)	
CHANEL KELLY, Village of Robbins	)	
Trustee, in her individual and official	)	
capacities, ERNESTINE	)	
BECK-FULGHAM, Village of Robbins	)	
Administrator, in her individual and official	)	
Capacities, and the VILLAGE OF	)	
ROBBINS, ILLINOIS,	)	
	)	
Defendants.	)	

**PLAINTIFF’S SUPPLEMENT TO MOTION FOR FORENSIC EXAMINATION**

NOW COMES Plaintiff, Christian Daigre, by and through one of his attorneys,  
Laura L. Scarry of DeANO & SCARRY, LLC, and pursuant to this Court’s order dated

February 10, 2016 (*See*, Docket No. 116), hereby supplements his Motion for Forensic Examination (*See*, Docket No. 99) (hereinafter referred to as “Motions”) as follows:

During a February 10, 2016 hearing on Plaintiff’s Motion, this Court ordered Plaintiff to identify one of the numerous servers/desktops/laptops/phones/databases listed in Plaintiff’s Motion that should be given priority in the event the Court is persuaded to allow a forensic examination. In response, Plaintiff identifies the computer that Defendant Mel Davis regularly and primarily utilized while he was Chief of Police for the Village of Robbins.

Second, although not addressed in the minute order of February 10, 2016, the Court ordered Plaintiff to select one search term to be used during the preliminary forensic examination of the item he selected for examination. The obvious search term would be Plaintiff’s name, “Christian Daigre” and both “Christian” and “Daigre.” It is impossible for Plaintiff to know which of the two identifiers Defendant Davis utilized most often when using his computer to refer to Plaintiff and for that reason Plaintiff selects the search term “Christian Daigre” (and both “Christian” and “Daigre”) for use during the forensic examination. If this Court literally meant for Plaintiff to identify one search term, then Plaintiff reluctantly selects “Daigre.”

Respectfully submitted,

s/Laura L. Scarry  
Laura L. Scarry  
One of Plaintiff’s Attorneys

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